

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Petition for Waiver of Section 64.402)	WT Docket No. 01-320
Of the Commission's Rules)	

WITHDRAWAL OF PETITION FOR WAIVER

Verizon Wireless hereby withdraws its November 2, 2001, petition for a waiver of the Commission's rule for the provision of priority access service ("PAS"), 47 C.F.R. § 64.402. Verizon Wireless sought a waiver to allow it to implement a limited form of PAS, called "Immediate Service PAS," because Immediate PAS did not meet the queuing and other requirements of Section 64.402.

Verizon Wireless appreciates the Commission's consideration of its petition. It has determined, however, that the better course is to respond to the Government's emergency communications needs in ways that do not require FCC action at this time.

First, Verizon Wireless and other wireless carriers are working with the National Communications System on a more comprehensive, industry-wide solution for providing Government personnel with priority access to commercial wireless networks. NCS and its systems integrator, Dyncorp, have already held a number of meetings with the wireless industry aimed at developing that solution. Verizon Wireless will continue to participate in these meetings. That joint Government-industry effort may yield a PAS

solution that will meet all of the requirements of Section 64.402, thereby not requiring a waiver of the Commission's PAS rule as would Immediate PAS.

Second, Verizon Wireless intends to respond to specific emergency communications needs of the Government by taking actions to increase its network capacity and the ability of people to place calls. These steps may include, for example, deploying portable cell sites, known as cells-on-wheels ("COWs"), rerouting traffic, distributing handsets, and sending Company personnel to specific communities where sharply increased network traffic is expected or is occurring.

The Company is ready to take these and other actions in communities it serves where significant additional capacity is needed, and will quickly respond to government requests that it deploy such capacity, as it has done in past emergencies. In those situations, which included not only the September 11 terrorist attacks but other aviation accidents (such as the November 12 crash of Flight 587 on Long Island), hurricanes, floods and other disasters, Verizon Wireless has quickly increased the ability of people (including emergency workers) to place calls by promptly taking these and other actions. For example, in the aftermath of September 11, the Company deployed 21 separate COWs, distributed more than 7,000 free handsets to emergency response personnel, and sent network and other personnel to the disaster sites to help with rescue efforts.

The actions outlined above promote the goals of PAS by increasing the likelihood that government personnel can place and receive calls in high-demand situations, while avoiding the need for a waiver that Immediate PAS would have required. Accordingly, Verizon Wireless is withdrawing its request for waiver.

Respectfully submitted,

VERIZON WIRELESS

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Dated: December 13, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing “Withdrawal of Petition for Waiver” to be sent by first-class mail, postage prepaid, this 13th day of December, 2001, to the following:

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